

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

RAMONA THURMAN BIVINS,

Plaintiff,

vs.

FELICIA FRANKLIN, in her individual
and official capacities;
ALIEKA ANDERSON, in her individual
and official capacities;
GAIL HAMBRICK, in her individual
and official capacities; and
CLAYTON COUNTY, GEORGIA,

Defendants.

CIVIL ACTION NO.:
1:22-cv-04149-WMR

**DEFENDANTS GAIL HAMBRICK AND CLAYTON COUNTY,
GEORGIA’S CONSENT MOTION TO EXTEND THE
DEADLINE TO ANSWER, PLEAD, OR OTHERWISE
RESPOND TO PLAINTIFF’S COMPLAINT**

COME NOW Defendants Gail Hambrick and Clayton County, Georgia (“Defendants”) by and through their undersigned counsel and, pursuant to Fed. R. Civ. P. (6)(b), hereby move for an extension of time to respond to Plaintiff’s Complaint, seeking an extension of this deadline through and including December 5, 2022. In support of this motion, Defendants respectfully show as follows:

Defendant Clayton County, Georgia's answer or responsive pleading is currently due on November 16, 2022, and Defendant Hambrick's answer or responsive pleading is currently due on November 17, 2022. Counsel for the Defendants have conferred with Plaintiff's counsel, and Plaintiff consents to Defendants' request for this extension. The additional time is requested to accommodate the recent retention of the undersigned counsel and to allow Defendants the time needed to evaluate Plaintiff's claims and prepare any necessary responsive pleadings.

WHEREFORE, Defendants respectfully request that they be granted an extension through and including December 5, 2022 to answer, plead, or otherwise respond to Plaintiff's Complaint. All defenses are hereby reserved. A proposed order is attached for the Court's convenience.

CERTIFICATE OF COMPLIANCE

I hereby certify that the within and foregoing has been prepared in compliance with Local Rule 5.1(B) in 14-point Times New Roman type face.

Respectfully Submitted,

/s/ John D. Bennett

A. Ali Sabzevari

Georgia Bar No. 941527

asabzevari@fmglaw.com

Kirsten S. Daughdril

Georgia Bar No. 633350

Kirsten.daughdril@fmglaw.com

John D. Bennett

Georgia Bar No. 059212

jbennett@fmglaw.com

Counsel for Defendants

FREEMAN MATHIS & GARY, LLP

100 Galleria Parkway, Suite 1600

Atlanta, Georgia 30339-5948

T: 770.818.0000

F: 770.937.9960

CERTIFICATE OF SERVICE

I certify that I have this day filed the within and foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send electronic mail notification of such filing to the following counsel of record who are CM/ECF participants:

Andrew Ready Tate
Edward D. Buckley
Buckley Beal LLP
600 Peachtree Street, NE
Suite 3900
Atlanta, Georgia 30308
atate@buckleybeal.com
edbuckley@buckleybeal.com

Counsel for Plaintiff

This 10th day of November, 2022.

/s/ John D. Bennett
John D. Bennett
Georgia Bar No. 059212
Counsel for Defendants

FREEMAN MATHIS & GARY, LLP
100 Galleria Parkway, Suite 1600
Atlanta, Georgia 30339-5948
T: 770.818.0000
F: 770.937.9960
E: jbenett@fmglaw.com